

EXHIBIT

A

Court of Common Pleas of Philadelphia County
Trial Division
Civil Cover Sheet

(For Prothonotary Use Only (Docket Number))

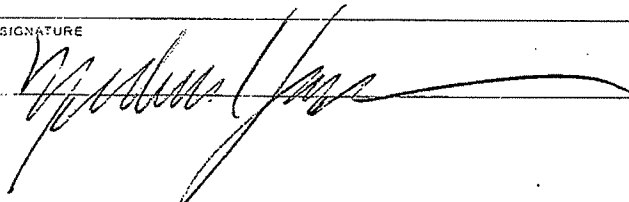
JULY 2007**004354**

PLAINTIFF'S NAME TANYA ALEXANDER		DEFENDANT'S NAME WAL-MART STORES, INC.									
PLAINTIFF'S ADDRESS 414 Walnut Street, Pottstown, PA 19464		DEFENDANT'S ADDRESS c/o CT Corporation System, 1635 Market Street Philadelphia, PA 19103									
PLAINTIFF'S NAME		DEFENDANT'S NAME Coca Cola Bottling Company									
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS c/o CT Corporation System, 1635 Market Street Philadelphia, PA 19103									
PLAINTIFF'S NAME		DEFENDANT'S NAME									
PLAINTIFF'S ADDRESS		DEFENDANT'S ADDRESS									
TOTAL NUMBER OF PLAINTIFFS 1	TOTAL NO. OF DEFENDANTS 2	COMMENCEMENT OF ACTION <input checked="" type="checkbox"/> Complaint <input type="checkbox"/> Petition Action <input type="checkbox"/> Notice of Appeal <input type="checkbox"/> Writ of Summons <input type="checkbox"/> Transfer From Other Jurisdictions									
AMOUNT IN CONTROVERSY <input type="checkbox"/> \$50,000.00 or less <input checked="" type="checkbox"/> More than \$50,000.00	COURT PROGRAMS <input type="checkbox"/> Arbitration <input type="checkbox"/> Mass Tort <input type="checkbox"/> Commerce <input type="checkbox"/> Settlement <input type="checkbox"/> Jury <input type="checkbox"/> Savings Action <input type="checkbox"/> Minor Court Appeal <input type="checkbox"/> Minors <input checked="" type="checkbox"/> Non-Jury <input type="checkbox"/> Petition <input type="checkbox"/> Statutory Appeals <input type="checkbox"/> W/D/Survival <input type="checkbox"/> Other: _____										
CASE TYPE AND CODE (SEE INSTRUCTIONS) 2S -											
STATUTORY BASIS FOR CAUSE OF ACTION (SEE INSTRUCTIONS)											
RELATED PENDING CASES (LIST BY CASE CAPTION AND DOCKET NUMBER)			IS CASE SUBJECT TO COORDINATION ORDER? <table border="1"> <tr> <th>Yes</th> <th>No</th> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> <tr> <td><input type="checkbox"/></td> <td><input type="checkbox"/></td> </tr> </table>	Yes	No	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Yes	No										
<input type="checkbox"/>	<input type="checkbox"/>										
<input type="checkbox"/>	<input type="checkbox"/>										
<input type="checkbox"/>	<input type="checkbox"/>										

TO THE PROTHONOTARY:

Kindly enter my appearance on behalf of Plaintiff/Petitioner/Appellant:

Papers may be served at the address set forth below.

NAME OF PLAINTIFF'S/PETITIONER'S/APPELLANT'S ATTORNEY Michael T. Leabman, Esquire		ADDRESS (SEE INSTRUCTIONS) 1608 Walnut Street, Suite 800 Philadelphia, PA 19103	
PHONE NUMBER (215) 732-0900	FAX NUMBER (215) 732-3178		
SUPREME COURT IDENTIFICATION NO. 71816		E-MAIL ADDRESS MTLEABMANATTY@hotmail.com	
SIGNATURE 		DATE 7/25/07	

By: Sidney I. Leabman, Esquire
 By: Michael T. Leabman, Esquire
 Attorney I.D. No.'s: 12902/71816
SIDNEY I. LEABMAN & ASSOCIATES, P.C.
 1608 Walnut Street, Suite 800
 Philadelphia, PA 19103
 (215) 732-0900/(215) 732-2600
 FAX (215) 732-3178

Attorneys for *Plaintiff*

APR 07 2008

DISCOVERY DEADLINE: _____

TANYA ALEXANDER
 414 Walnut Street
 Pottstown, PA 19464

Plaintiff

v.

WAL-MART STORES, INC.
 c/o CT CORPORATION SYSTEM
 1635 Market Street
 Philadelphia, PA 19103

and

COCA-COLA BOTTLING COMPANY
 c/o CT CORPORATION SYSTEM
 1635 Market Street
 Philadelphia, PA 19103

Defendants

PHILADELPHIA COUNTY
 COURT OF COMMON PLEAS

JULY TERM 2007

004354

NO.:

ATTEST

JUL 27 2007

D. Savage

COMPLAINT - CIVIL ACTION
2S PREMISES LIABILITY

"NOTICE"

"YOU HAVE BEEN SUED IN COURT. IF YOU WISH TO DEFEND AGAINST THE CLAIMS SET FORTH IN THE FOLLOWING PAGES, YOU MUST TAKE ACTION WITHIN TWENTY (20) DAYS AFTER THIS COMPLAINT AND NOTICE ARE SERVED, BY ENTERING A WRITTEN APPEARANCE PERSONALLY OR BY ATTORNEY AND FILING IN WRITING WITH THE COURT YOUR DEFENSES OR OBJECTIONS TO THE CLAIMS SET FORTH AGAINST YOU. YOU ARE WARNED THAT IF YOU FAIL TO DO SO THE CASE MAY PROCEED WITHOUT YOU AND A JUDGMENT MAY BE ENTERED AGAINST YOU BY THE COURT WITHOUT FURTHER NOTICE FOR ANY MONEY CLAIMED IN THE COMPLAINT OR FOR ANY OTHER CLAIM OR RELIEF REQUESTED BY THE PLAINTIFF. YOU MAY LOSE MONEY OR PROPERTY OR OTHER RIGHTS IMPORTANT TO YOU.

YOU SHOULD TAKE THIS PAPER TO YOUR LAWYER AT ONCE. IF YOU DO NOT HAVE A LAWYER THIS OFFICE CAN PROVIDE YOU WITH INFORMATION ABOUT HIRING A LAWYER. GO TO OR TELEPHONE THE OFFICE SET FORTH BELOW. IF YOU CANNOT AFFORD TO HIRE A LAWYER, THIS OFFICE MAY BE ABLE TO PROVIDE YOU WITH INFORMATION ABOUT AGENCIES THAT MAY OFFER LEGAL SERVICES TO ELIGIBLE PERSONS AT A REDUCED FEE OR NO FEE.

Lawyer Referral Service (215) 238-6300
 One Reading Center
 Philadelphia, PA 19107
 (215) 238-1701

"AVISO"

"LE HAN DEMANDADO A USTED EN LA CORTE, SI USTED QUIERE DEFENDERSE DE ESTAS DEMANDAS EXPUESTAS EN LAS PAGINAS SIGUIENTES, USTED TIENE VEINTE (20) DIAS DE PLAZO AL PARTIR DE LA FECHA DE LA DEMANDA Y LA NOTIFICACION. HACE FALTA ASCENDER UNA COMPARENCIA ESCRITA O EN PERSONA O CON UN ABOGADO Y ENTREGAR A LA CORTE EN FORMA ESCRITA SUS DEFENSAS O SUS OBJECIONES A LAS DEMANDAS EN CONTRA SU PERSONA. SEA AVISADO QUE SI USTED NOT SE DEFIENDE, LA CORTE TOMARA MEDIDAS Y PUEDE CONTINUAR LA DEMANDA EN CONTRA SUYA SIN PREVIO AVISO O NOTIFICACION. ADEMÁS, LA CORTE PUEDE DECIDIR A FAVOR DEL DEMANDANTE Y REQUIERE QUE USTED CUMPLA CON TODAS LAS PROVISIONES DE ESTA DEMANDA. USTED PUEDE PERDER DINERO O SUS PROPIEDADES U OTROS DERECHOS IMPORTANTES PARA USTED.

LLEVE ESTA A DEMANDA A UN ABOGADO INMEDIATAMENTE, SI NO TIENE ABOGADO O SI NO TIENE EL DINERO SUFICIENTE DE PAGAR TAL SERVICIO, VAYA EN PERSONA O LLAME POR TELEFONO A LA OFICINA CUYA DIRECCION SE ENCUENTRA ESCRITA ABAJO PARA AVERIGUAR DONDE SE PUEDE CONSEGUIR ASISTENCIA LEGAL.

SERVICIO DE LICENCIADOS,
 SERVICIO DE REFERENCIA E INFORMACION LEGAL
 Servicio De Referencia E. Informacion
 One Reading Center
 Philadelphia, Pennsylvania 19107
 Telefono: (215) 238-1701

By: Sidney I. Leabman, Esquire
 By: Michael T. Leabman, Esquire
 Attorney I.D. No.'s: 12902/71816

Attorneys for *Plaintiff*

SIDNEY I. LEABMAN & ASSOCIATES, P.C.
 1608 Walnut Street, Suite 800
 Philadelphia, PA 19103
 (215) 732-0900/(215) 732-2600
 FAX (215) 732-3178

TANYA ALEXANDER
 414 Walnut Street
 Pottstown, PA 19464

Plaintiff

v.

WAL-MART STORES, INC.
 c/o CT CORPORATION SYSTEM
 1635 Market Street
 Philadelphia, PA 19103

and

COCA-COLA BOTTLING COMPANY
 c/o CT CORPORATION SYSTEM
 1635 Market Street
 Philadelphia, PA 19103

Defendants

PHILADELPHIA COUNTY
 COURT OF COMMON PLEAS

JULY TERM 2007

NO.:

COMPLAINT - CIVIL ACTION
2S PREMISES LIABILITY

1. Plaintiff, Tanya Alexander (hereinafter "Alexander") is an adult individual who resides at 414 Walnut Street, Pottstown Pennsylvania 19464.
2. Defendant, Wal-Mart Stores, Inc. (hereinafter "Wal-Mart") is a corporation and/or other business entity organized and existing under the laws of the Commonwealth of Pennsylvania, with an address for service of process at 1635 Market Street, Philadelphia, PA 19103.
3. At all times material hereto, said Defendant owned, leased and/or possessed, controlled and/or maintained the premises involved in the hereinafter mentioned accident.

4. At all times material hereto, said Defendant acted and/or failed to act by and through their respective agents (ostensibly, apparent or actual), servants, workmen and/or employees and each other then and there acting within the course and scope of their agency, employment and/or authority, and within the course and scope of their authority in furtherance of their business.
5. Defendant, Coca-Cola Bottling Co. (hereinafter "Coca-Cola") is a corporation and/or other business entity, organized and existing under the laws of the Commonwealth of Pennsylvania, with an address for service of process at 1635 Market Street, Philadelphia, PA 19103.
6. At all times material hereto, said Defendant acted and/or failed to act by and through their respective agents (ostensibly, apparent or actual), servants, workmen and/or employees and each other then and there acting within the course and scope of their agency, employment and/or authority, and within the course and scope of their authority in furtherance of their business.
7. At all times material hereto, said Defendant, "Coca Cola" owned, leased and/or possessed, operated, controlled and/or maintained, managed a certain vending refrigerated cooler and had a duty and responsibility to operate, maintain, inspect, construct, create, supervise, repair, control and otherwise keep in safe and proper condition, said vending refrigerated cooler, involved in the hereinafter mentioned accident.
8. On or about June 24, 2006, at approximately 3:45 p.m., Plaintiff, Tanya Alexander was among the business invitees and patrons at "Wal-Mart".
9. On the aforesaid date and time, and for some time prior thereto, Defendants acting by and through their agents, servants, workmen and/or employees, acting as aforesaid, carelessly and

negligently, allowed a dangerous and defective condition to exist, to wit: a vending refrigerated cooler which was leaking liquid onto the floor of defendants premises, causing the floor to be wet and caused Plaintiff to suddenly fall while attempting to purchase her items, causing her serious injuries hereinafter described.

10. At all times material hereto, there was a dangerous condition of the premises, more fully hereinafter set forth, which created a reasonably foreseeable risk of the kind of injury which was incurred by Plaintiff.

11. Plaintiff, Tanya Alexander, was lawfully proceeding through the store located at 233 Shoemaker Road, Pottstown, PA 19464 when she slipped, stumbled and/or fell, by reason of the dangerous and defective condition or conditions of said store floor, including liquids, which condition or conditions existed on that date and for sometime prior thereto in which Defendant had or should have had knowledge of the existence thereof.

12. The aforesaid accident was due solely to the negligence and carelessness of the Defendants, jointly and/or severally, and was due in no manner whatsoever to any act or failure to act on the part of the Plaintiff.

13. The aforesaid accident was caused by the negligence, carelessness and/or recklessness of Defendants acting by and through their agents, (ostensibly, apparent and/or actual), servants, workmen and/or employees and consisting *inter alia*, of the following:

- (a) Carelessly and negligently creating, allowing permitting liquid substances to exist on said floor;
- (b) Carelessly and negligently creating, allowing and permitting the existence of the dangerous and/or defective floor;
- (c) Carelessly and negligently creating, allowing and permitting said floor to exist in a state which

Defendant knew was dangerous to the public;

- (d) Negligently creating a dangerous and/or defective condition or conditions on said floor;
- (e) Failing to maintain said floor in a safe and proper condition;
- (f) Failing to regularly inspect said floor so as to insure it was in proper and safe condition;
- (g) Failure to warn and/or notify Plaintiff of the existence of liquids on said floor;
- (h) Failure to warn and/or notify plaintiff of the existence of the dangerous and/or defective floor;
- (i) Failure to warn and/or notify Plaintiff of the degree of disrepair of said floor;
- (j) Failure to remedy the liquids and/or defects on said floor;
- (k) Failure to remedy the dangerous and/or defective floor;
- (l) Failure to remedy the disrepair of said floor;
- (m) Failure to provide a safe walkway for pedestrian travel on said floor;
- (n) Negligently creating the dangerous condition of liquids on said floor;
- (o) Negligently failing to illuminate the store floor, so as to warn Plaintiff of the dangerous condition of liquids lying on said floor;
- (p) Negligently creating the dangerous condition of water, soda and other liquids lying on the floor;
- (q) Negligently failing to remove liquids

14. As a result of Defendants' negligence as aforesaid, Plaintiff Tanya Alexander has suffered

injuries which are serious and permanent in nature, including but not limited to, L5/S1 central, right paracentral and lateral disc protrusion impinging on the ventral and rightward ventral aspect of the thecal sac and the right S1 nerve root, right prominent bilateral L5/S1 radiculopathy, acute cervical, thoracic and lumbar strain and sprain with myofascitis, acute myofascial syndrome, all of which has resulted in the need for continuing medical services and which has resulted in a permanent disability, and neck and back injuries, nervous shock, internal injuries of an unknown nature, severe aches, pains, mental anxiety and anguish and severe shock to her entire nervous system and other injuries, maladies or health concerns, the full extent of which is not yet known, all of which injuries have in the past and will in the future cause Plaintiff great pain and suffering.

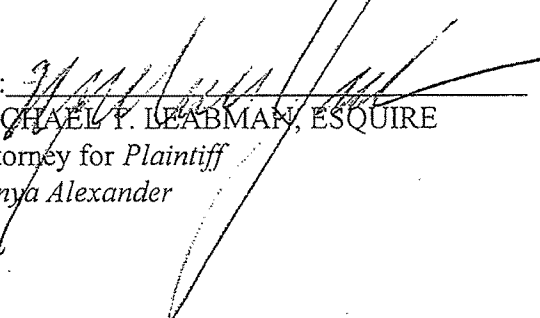
15. Plaintiff has in the past, and will in the future, undergo severe pain and suffering as the result of which she has been in the past and will in the future be unable to attend to her usual duties and activities.
16. Due to all the foregoing, Plaintiff has been compelled, in order to effectuate a cure for the aforesaid injuries, to expend large sums of money for medicine and medical attention and may be required to expend additional sums for an indefinite time in the future: medical bills to date total approximately, \$15,585.20.
17. As a further result of the foregoing, Plaintiff has and will in the future, suffer a severe loss of earnings and impairment of her earning capacity and power.
18. Plaintiff has suffered medically determinable physical and/or mental impairment which prevents the Plaintiff from performing all or substantially all of the material acts and duties which constituted the Plaintiff's usual and customary activities prior to the accident.
19. As a direct result of the accident aforementioned, Plaintiff has or may hereafter incur other

financial expenses.

20. Plaintiff has suffered severe physical pain, mental anguish, loss of life's pleasures and humiliation, and may continue to suffer same for an indefinite period of time in the future.

WHEREFORE, Plaintiff demands judgment in her favor and against the Defendants, Wal-Mart Stores, Inc. and Coca Bottling Company herein in a sum in excess of Fifty Thousand (\$50,000.00) Dollars, together with costs, delay damages, pre and post judgment interests, attorney fees, and all other relief provided by law.

THE LEABMAN LAW FIRM, P.C.

By: 
MICHAEL P. LEABMAN, ESQUIRE
Attorney for Plaintiff
Tanya Alexander

VERIFICATION

I, Tanya Alexander, being duly sworn according to law, depose and say that the facts set forth in the foregoing are true and correct to the best of his/her knowledge, information and belief. I understand that I am subject to the penalties of 18 Pa. C.S. Section 4904, relating to unsworn falsification to authorities for any false statements made herein.

Tanya Alexander

DATE: 6/1/07